

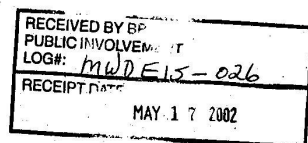
**Renewable
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Renewable Northwest Project

May 14, 2002

Bonneville Power Administration, KC-7
P.O. Box 12999
Portland, Oregon 97212

Subject: Maiden Wind Farm Draft EIS Comments

The Renewable Northwest Project (RNP) appreciates the opportunity to comment on the Draft Environmental Impact Statement for the proposed Maiden Wind Farm Project. RNP is a unique combination of renewable energy companies, environmental organizations and consumer groups working together to promote the implementation of new renewable resources in Montana, Idaho, Oregon and Washington.

Renewable resources need to be examined within the context of the resources they displace and the problems they help avoid. Investing in properly sited renewable resources can protect the environment, promote economic development, diversify the power system and keep the region competitive.

RNP commends Bonneville's leadership and commitment to developing wind. We support properly sited wind projects that have taken the necessary measures to mitigate all the potential impacts. We offer the following comments on the Draft EIS.

Draft EIS Comments

I. Environmental Benefits

The Maiden Wind Farm Project provides an opportunity to diversify the region's fuel supply and avoid the adverse environmental impacts associated with fossil-fueled resources and hydro. Fossil fuels are major sources of acid rain, pollution-caused illnesses, habitat destruction, smog and greenhouse gases.

In comparison to developing a new gas plant, developing a 494 MW wind project operating at 30% capacity factor would avoid at least 567,976 tons of carbon dioxide (the principal cause of global warming) and 54 tons of acid rain precursors (sulfur dioxide and nitrogen oxides) a year.

The no action alternative means allowing for more polluting and destructive resources such as new gas plants to come online immediately. Thus, the no action alternative should better document the air pollution and water quality impacts that will result from a greater reliance on fossil fuels. We believe the benefits of wind would be even more dramatic if the no action alternative reflected the full costs of a strategy that fosters more destructive resources.

II. Project Size

The proposed project is up to 494 MW. If 494 MW are developed, this would be the largest new wind farm in the world. It would be useful to first state and show on the map the initial phase of the project. The subsequent phases of the project should also be shown on the map as well.

Due to the potential size of the project, we feel that interested parties should be allowed the opportunity to comment on the additional phases of development. Our comments relate to initial development.

III. Visual Impacts

Although the counties affected by the proposed project have no specific policy on the impact of wind projects on visual resources, this issue, if not adequately addressed, could negatively impact the project, the expansion phases, and proposed wind projects in the vicinity.

The visibility of the turbines will be further heightened if the proposed project resulted in 125 to 175 daytime and nighttime lights for aircraft safety requirements. This means that one out of three to four turbines will be required to have flashing white and red lights.

RNP believes that the flashing white and red lights could potentially generate complaints from the local community. For example, some surrounding local residents for the Stateline Wind Project already have complained about the flashing red and white lights on the turbines. At the public meeting for another proposed wind project in Ellensburg, WA, an interested party also raised the concern of flashing daytime and nighttime lights.

RNP recommends BPA to 1) state what the FAA requirement is for this project and 2) make sure that the local community is fully aware of the visual impacts.

IV. Vegetation and Wildlife Impacts

RNP is pleased to see that BPA and Washington Wind Inc. are working with agencies on mitigation and monitoring programs for the vegetation and wildlife impacts.

We recommend including other potentially interested parties, such as the local Audubon chapters in these plans.

Conclusion

Wind projects are important to the region's environment and economy. We support wind projects that have taken the necessary steps for proper siting, developing, operation and maintenance. While addressing the key issues of expanding wind generation in the area, the EIS needs to also provide a relative comparison of wind to its generation alternatives in order to fully understand the benefits of a good wind project.

Thank you for your consideration of our comments. We look forward to working with you on evaluating this project.

Sincerely,


Sonja Ling
Policy Associate

May 17, 2002

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RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MWDEIS-027 RECEIPT DATE: MAY 20 2002

Dear Ms. Branum and Mr. Shuttleworth,

Thank you for the opportunity to provide comments on the Maiden Wind Farm Draft EIS. These comments represent the concerns of Yakima Valley Audubon Society, a non-profit organization dedicated to the preservation and protection of birds, wildlife and their habitats. Our comments on the Draft EIS (DEIS) focus on the impacts the proposed Maiden Wind Farm Project will have on habitats, birds and other wildlife of the project area, located in Yakima and Benton Counties, Washington.

On May 15, 2002 we submitted an outline of our concerns on the DEIS to include:

- Lack of avoidance of areas of historical importance for Ferruginous Hawks
- Inadequate mitigation measures for impacts for Ferruginous Hawks and other raptors
- Inadequate attention of impacts to prey base
- Inadequate attention to nocturnal flight patterns of migratory birds and potential impacts from the project
- Lack of avoidance of ecosystem impacts to shrub steppe and grassland habitats
- Inadequate mitigation measures for impacts to shrub steppe and grassland habitats
- Impacts of lights on Wind Towers to migrating birds and bats
- Potential fire destruction of habitats and fire management plan
- Proposed Impacts of taking out 100 acres of CRP
- Decommissioning Impacts of the project

This letter is intended to expand on issues pertaining to the above topics. We hope that further communication between ourselves, the project proponent, Yakima and Benton Counties, BPA and U.S. and State wildlife authorities can take place prior to the Final EIS to discuss the above topics and establish parameters for the Maiden Wind Farm project that will avoid permanent environmental damage. In summary, we are extremely disappointed that the proposed Maiden Wind Farm project and the suggested mitigation measures do little to protect valuable natural resources in the area while still providing for valuable wind energy resources. Nowhere in the DEIS does it suggest that some wind turbines should NOT be constructed because of impacts to native vegetation, habitats or birds and wildlife. Therefore, should a number of turbines not be constructed, the DEIS does not address if the project would be economical to construct, based on power that would be generated from less turbines.

We believe there is an opportunity to develop wind power in a responsible manner in the State of Washington and to do so, a better balance between wind development and environmental protection should be forthcoming in the months prior to construction of the proposed 549 wind turbine Maiden Wind Farm project.